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**Wills—Signature Thereto—Section 2514, Va. Code 1904.**—Where a will, the body of which is written on horizontal lines on several pages of foolscap paper, so that all its items and provisions are in consecutive order to the end of the last page, under which the testator's signature appears, but there is also written in the margin of the last page to the left of, and separated from, the body of the instrument, a dispositive clause extending lengthwise of the page from near the bottom to near the top, and in no manner connected with the body of the instrument by any words or marks to indicate where the marginal matter is to be read in relation to the other provisions, and it is established by testimony that the marginal matter was written after all the other provisions, at the request of the testator, and before he attached his signature under the body of the will,—it is held, in *Irwin v. Jacques* (Ohio), 69 L. R. A. 422, that the will is not signed at its end, as required by statute, and is invalid for that reason.

Sec. 2514, Va. Code 1904, requires that the will must be signed by the testator "in such manner as to make it manifest that the name is intended as a signature;" and in *Dinning v. Dinning*, 102 Va. 467, 46 S. E. 473, where a will ended thus: "I, W. D., say this is my last will and testament," it was held to be a sufficient signature; and it has also been held that the statute does not require the signature to be at the foot, but it is an equivocal circumstance if placed anywhere else. *Ramsey v. Ramsey's Ex'r*, 13 Gratt. 66.

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**Constitutional Law—Due Process of Law—Right of One in Jail Accused of Homicide to Be Privately Examined by Physician.**—In the recent case of *Commonwealth v. Estelle Smith*, in the Corporation Court of the city of Manchester, counsel for the defendant desired a physician to make an examination of the condition of the defendant with a view to preparing her defense in the approaching trial. The jailer, acting under the instructions of the Judge of the Corporation Court of Manchester, refused to allow the said physician to see the defendant, except in the presence of the jail physician. At the trial of the case, the defendant's counsel, after a correspondence with the aforesaid judge in which the refusal was confirmed, moved for the continuance of the trial, on the ground that the refusal of the court had prevented the counsel from properly preparing their defense. The court overruled the motion; to which the defendant excepted, and the trial resulted in the conviction of the defendant.

In the petition for the writ of error in the Supreme Court, the only ground assigned therefor was the refusal of the trial court to allow the defendant's physician to examine her out of the presence of the jail physician. It was strongly contended that this was a denial of due process of law guaranteed by our constitution, (§ 8), and it was